

IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSISSIPPI

HAZEL THOMPSON

PLAINTIFF

VS.

CAUSE NO. L20-532

WALGREEN CO. d/b/a WALGREENS

DEFENDANT

COMPLAINT
JURY TRIAL DEMANDED

COMES NOW the Plaintiff, Hazel Thompson, through her counsel, David G. Hill, and files this her Complaint against the Defendant, Walgreen Co. d/b/a Walgreens, and in support shows as follows:

1. Plaintiff Hazel Thompson is an adult resident citizen of Lafayette County, Mississippi, and was so on February 21, 2018.

2. The Defendant, Walgreen, Co. d/b/a Walgreens, is a national company, Incorporated in the State of Illinois, and licensed to do business in the State of Mississippi, and specifically doing business on February 21, 2018, as Walgreens at its location in Oxford, Mississippi, specifically addressed as 1808 University Avenue, Oxford, Mississippi. The Defendant is involved in the general merchandise business and in the preparation of and delivery to the public of prescription medications as prescribed by licensed medical providers. The Defendant may be served with process by serving its registered agent The Prentice-Hall Corporation System, Inc., 7716 Old Canton Road, Suite C, Madison, MS 39110.

3. Jurisdiction and venue are proper in the Circuit Court of Lafayette County, Mississippi, in that the cause of action occurred in Lafayette County, Mississippi, and the Plaintiff is a resident of Lafayette County, Mississippi.

LAFAYETTE COUNTY
FILED

DEC 11 2020

JEFF BUSBY
CIRCUIT CLERK

BY: DMG D.C.

4. The Plaintiff, on February 21, 2018, needed and sought medical attention. As a result of that medical attention, the Plaintiff was given a prescription for Acetaminophen/Hydrocodone. Instead, the Walgreens at 1808 University Avenue in Oxford placed into Plaintiff's prescription bottle the drug Alfuzosin, which is a prostrate drug for men. Plaintiff is a female. Shortly after taking what she thought was the prescribed medication for her, the Plaintiff became dizzy, light headed and fainted, falling onto and across an electric space heater, resulting in severe injury to the Plaintiff, including intense burns, physical pain and suffering, permanent physical scarring and permanent mental and emotional injury.

5. The Defendant's employees apparently gave the Plaintiff medication intended for another Walgreen's customer. The Defendant's employees should never mix one customer's medication up with another customer's. To be so careless as to do so is absolute gross negligence for which an award of punitive damages should issue.

6. The Defendant Walgreens owes a duty to this Plaintiff and to the public at large to be careful and correct in terms of the medications pass to Walgreen's customers. In this case, that duty has been breached or ignored, proximately resulting in the extensive and lifelong injuries to this Plaintiff.

ACCORDINGLY, PREMISES CONSIDERED, Plaintiff prays that this Court will receive and docket her Complaint; that the Court will issue all process due to the Defendant; that the Court will issue scheduling orders addressing the prosecution and advancement of this case; that the Court will set this matter for a jury trial and will award this Plaintiff all damages due to her for her injuries, including compensatory damages for her physical injuries; for the physical pain and suffering she has experienced and will continue to suffer; for the extensive physical scarring she has suffered and will continue to suffer; for the mental and emotional pain she has suffered and

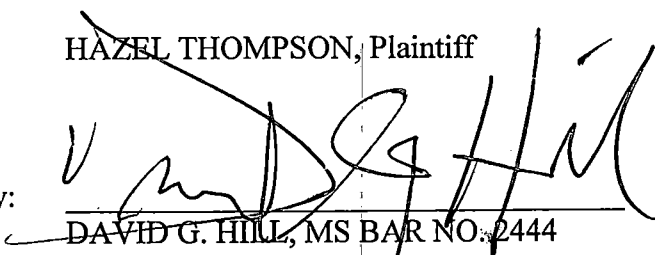
will continue to suffer, all based on the Defendant's breach of duty to her and the public; for all her medical expenses; and the Defendant seeks punitive damages based upon the Defendant's incompetence and gross negligence in giving her medication wholly unsuited for her medical needs actually intended for somebody else.

DATED this 10th day of December, 2020.

RESPECTFULLY SUBMITTED,

HAZEL THOMPSON, Plaintiff

By:



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